

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

CENTER FOR BIOLOGICAL DIVERSITY;  
DEFENDERS OF WILDLIFE; ANIMAL LEGAL  
DEFENSE FUND,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States of America; PATRICK  
M. SHANAHAN, in his official capacity as Acting  
Secretary of Defense; LIEUTENANT GENERAL  
TODD T. SEMONITE, in his official capacity as  
Commander and Chief of Engineers, U.S. Army  
Corps of Engineers; KEVIN McALEENAN, in his  
official capacity as Acting Homeland Security  
Secretary; DAVID BERNHARDT, in his official  
capacity as Secretary of the Interior,

Defendants.

Civil Action No. 1:19-cv-00408 (TNM)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY**

Defendants respectfully request a brief, four-business-day extension of the time in which to file a reply in support of Defendants' motion to dismiss. *See* ECF No. 22. In accordance with Local Rule 7(m), counsel for the parties have conferred, and Plaintiffs consent to this request. In support of this motion, Defendants submit the following:

1. On April 23, 2019, the Court granted Defendants' consent motion for a briefing schedule for Defendants' renewed motion to dismiss. *See* ECF No. 19; Minute Order (April 23, 2019). Pursuant to that order, Defendants' reply in support of their motion to dismiss is currently due June 12, 2019.

2. As the Court is aware, Defendants are actively litigating a number of matters concerning the same issues as the above-captioned matter. Several filing deadlines are set to occur in those matters between now and June 12, 2019, the current due date of Defendants' reply.

Specifically, Defendants are subject to the following deadlines:

- a. **June 7, 2019** – Administrative Records due in *State of California, et al. v. Trump, et al.*, 19-cv-872-HSG (N.D. Cal.) and *Sierra Club, et al. v. Trump, et al.*, 19-cv-892-HSG (N.D. Cal.)
- b. **June 10, 2019** – Opposition to and Cross-Motion for Summary Judgment due in *El Paso Cty., Tex., et al. v. Trump et al.*, 19-cv-66-DB (W.D. Tex.)
- c. **June 10, 2019** – Status report due in *U.S. House of Reps. v. Mnuchin, et al.*, 19-cv-969-TNM (D.D.C.)

3. For these reasons, good cause exists for a brief extension of time for Defendants to file their reply in support of Defendants’ motion to dismiss. Accordingly, Defendants respectfully request a four-business-day extension, until June 17, 2019, of the time in which to file a reply in support of Defendants’ motion to dismiss. Following the submission of this brief, Defendants will be prepared to appear for argument on the motion to dismiss at the Court’s earliest convenience.

4. As stated above, both Defendants and Plaintiffs have received a previous extension of time to file, respectively, Defendants’ motion to dismiss and Plaintiffs’ opposition to that motion. The extension requested in this motion would not affect any previously set deadlines.

5. Counsel for Defendants has consulted with counsel for Plaintiffs regarding this motion pursuant to Local Rule 7(m), and Plaintiffs have indicated that they do not oppose.

Dated: June 6, 2019

Respectfully submitted,

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Defendants.

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**[Proposed] ORDER**

Upon consideration of Defendants' Unopposed Motion for Extension of Time to File Reply,  
it is hereby ORDERED that the reply in support of Defendants' Motion to Dismiss (ECF No. 22)  
shall be filed on or before June 17, 2019.

DATED: June \_\_, 2019

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TREVOR N. McFADDEN  
United States District Judge